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August 28, 2023

**BY ECF**

Hon. John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Thapa, 22 CR 654 (JPC) (SDNY)**

Dear Judge Cronan:

I am writing on behalf of defendant Rikesh Thapa and with the consent of the government, by AUSA Timothy Capozzi, to respectfully request a three-week extension of time in which to file the defendant's pretrial motions, from September 8, 2023 to September 29, 2023, as well as corresponding extensions for the government's response and defendant's reply brief, so as to permit continued plea negotiations between the parties in this case.

To briefly explain, while counsel has completed reviewing the extraordinarily voluminous discovery and had begun initial discussions with the government concerning a potential disposition, AUSA Capozzi is on leave until the beginning of September, leaving an insufficient opportunity to resolve this case upon his return and prior to filing the defendant's pretrial motions. This is the defendant's first request for an extension of time to file pretrial motions and should Your Honor grant this application, no other previously set court dates, including the April 2024 trial date, will be impacted.

Thank you for the Court's consideration on this application. I remain available for a conference should Your Honor deem it necessary.

Respectfully submitted,

  
Jeffrey Lichtman

The request is granted. Defendant may submit any pretrial motions by September 29, 2023. The Government may respond by October 13, 2023, and Defendant may reply by October 20, 2023.

SO ORDERED.

August 29, 2023

New York, New York



JOHN P. CRONAN  
United States District Judge

cc: Tim Capozzi, Esq. (by ECF and email)  
Assistant United States Attorney